## CORRES. CONTROL OUTGOING LTR NO

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CLASSIFICATION:

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UNCLASSIFIED		
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AUTHORIZED CLASSIFIER SIGNATURE

EXEMPT FROM REVIEW PER CLASSIFICATION OFFICE

IN REPLY TO REP CC NO:

ACTION ITEM STATUS

PARTIAL/OPEN

CLOSED

LTB APPROVALS:



## SEGEG ROCKY FLATS



000023216

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

March 14, 1994

94-RF-02993

F. R. Lockhart Environmental Restoration Division DOE/RFO

CHANGES IN OPERABLE UNIT 4 (OU 4) PHASE I REMEDIATION DELIVERABLES AND SCHEDULES - SRK-052-94

This correspondence will serve to ensure that you are aware of the actions we have undertaken and are pursuing to react to the change in regulatory view of the threat presented by the solar pond liners and to make record of several conversations we have had with you and your staff on this matter. Additionally, it will serve to ensure that your attention has been directed to an area in which we feel that, together, we are at some risk.

The Colorado Department of Health (CDH) has stated that it cannot comply with the review schedule agreed to by all members of the Roundtable Review group and still perform an adequate review. We understand that in separate meetings with members of your staff, CDH discussed the subject of schedule extension (and, therefore, Interagency Agreement [IAG] milestone extension) and was supportive of the idea. We further understand, through statements made directly to us by your staff, that the Department of Energy/Rocky Flats Office (DOE/RFO) also supports extension. EG&G's position on this matter is that the original schedule is achievable and that all involved parties committed to its achievement. We understand that additional risk is incurred if inadequate review of the document is performed since the likelihood that future changes will be required by undiscovered errors is increased and that the cost of such changes will increase as the work becomes more advanced. Nevertheless, we are disappointed that the other parties to this joint agreement are not held to the same high standard of performance on their commitments as is EG&G.

The point is, perhaps, moot, since at this time, EG&G cannot absorb the double impact of late comments to the document and changes in the regulators' position on the liners into the schedule as it exists. The Joint Working Group decided at the Roundtable meeting on March 8, 1994 to extend the review period for the Operable Unit (OU) 4 Interim Measure/Interim Remedial Action Environmental Assessment Decision Document (IM/IRA EA DD) and to redirect their effort to complete review of the portions of the document which have so far received inadequate attention. The result of this decision is that review effort has ceased on Parts IV and above and has resumed on Parts I, II, and III. Since document review was on the critical path of the schedule which resulted in delivery of the Draft Proposed IM/IRA EA DD to the agencies on April 14, 1994, and since that review is not proceeding as scheduled, delivery of the document on the date promised is now impossible. EG&G believes that both DOE and EG&G are currently in a position of risk since compliance with the IAG (delivery of the document on April 14, 1994) cannot be achieved and formal request for milestone extension has not been made or granted.

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE F. R. Lockhart March 14, 1994 94-RF-02993 Page 2

EG&G is proceeding under the assumption that the DOE will be successful in extending all four IAG milestones (4/14/94, 6/24/94, 11/1/94, and 1/13/95) concerned with development and approval of the IM/IRA EA DD in accordance with the schedule which we have prepared and briefed to you on March 11, 1994. That schedule states specifically that the milestone for delivery of the Draft Proposed IM/IRA EA DD will not occur until May 20, 1994 (an extension of 36 calendar days) and implies that the other three milestones will be extended an equal amount. We also assume that two other milestones (Draft Phase II RFI/RI Work Plan [4/22/94] and Final Phase II RFI/RI Work Plan [9/19/94]) will be extended since the IM/IRA EA DD contains the Phase II RFI/RI Work Plan.

In accordance with that assumption, EG&G is diverting resources which would otherwise be consumed in the effort to comply with the original milestones to the tasks at hand required to evaluate the impacts of the new regulatory position on the liners. This diversion will take effect immediately. Sufficient resource will be retained and allocated to allow completion of review and distribution of the IM/IRA EA DD as presently constructed in time to meet the assumed new milestones.

EG&G will use these diverted resources to develop likely alternative remediation scenarios, estimate their costs and durations, and to prepare such information as DOE and EG&G will require to assess whether pursuit of an alternative to the current baseline is warranted. Additionally, EG&G will begin immediately to define and authorize all work necessary to perform re-evaluation of existing RFI/RI data, to determine the extant characteristics of ground water at the site, to develop lists of Contaminants of Concern (COCs) and risk-based Preliminary Remediation Goals (PRGs) required to augment the Colorado ground water standard, and to commence a field sampling and laboratory analysis effort to develop hard data on soils and liner leachability.

Existing schedules will be modified in accordance with these new efforts, and budgets will be analyzed to ensure that sufficient funding exists to support them. Formal change control procedures will be initiated immediately in the event that currently authorized scope or funding cannot be otherwise appropriately adapted, and the impacts of such formal changes will be incorporated into the schedule.

We would like to meet with you or your staff no later than March 18, 1994 to define the strategy that will be pursued to resolve all issues associated with extending the IAG milestones, with developing plans and schedules for determining the future course of OU 4 remediation, and with negotiating new milestone dates for portions of the IAG not now known to be affected. We will contact you to arrange for this meeting.

If our understanding of our conversations differs from that which you intended to communicate or if the actions which we have stated we will undertake are at variance with the course you wish us to follow, please notify us at once. If we have not heard to the contrary by March 18, 1994, we will assume our understandings and intended actions to be correct.

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If you have any questions regarding these matters, please contact Andy Ledford of my staff at extension 8673.

S. R. Keith Director

Solar Pond Projects EG&G Rocky Flats, Inc.

JAL:bep

Orig. and 1 cc - F. R. Lockhart

cc:

S. Howard - DOE/RFO

S. R. Surovchak - " "

M. A. Witherill - " "